

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RADHIKA VEGESNA, Personal :  
Representative of the ESTATE :  
OF RAJESH PADMARAJU, Deceased :  
Plaintiff :

VS. :

NO. 03-295 ERIE

ISD TRANSPORTATION COMPANY, :  
INC., MANDEEP SINGH, SAMINDER :  
SINGH, and SAMINDER SINGH, :  
d/b/a ISD TRANSPORTATION :  
COMPANY, INC., Defendants :

RADHIKA VEGESNA, Personal :  
Representative of the ESTATE :  
OF RAJESH PADMARAJU, Deceased :  
Plaintiff :

VS. :

NO. 03-317 ERIE

SAMINDER SINGH and SAMINDER :  
SINGH, d/b/a ISD :  
TRANSPORTATION COMPANY, INC., :  
Defendants :

PLAINTIFF'S THIRD SUPPLEMENTAL REQUESTS  
FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT,  
SAMINDER SINGH, d/b/a  
ISD TRANSPORTATION COMPANY, INC.

AND NOW comes the Plaintiff, RADHIKA VEGESNA, Personal Representative of the ESTATE OF RAJESH PADMARAJU, Deceased, by her counsel, ANDREW J. CONNER of CONNER RILEY & FRYLING, 17 West Tenth Street, P.O. Box 860, Erie, Pennsylvania 16512-0860, and submit the following Third Supplemental Requests for Production of Documents upon the Defendant, ISD TRANSPORTATION COMPANY, INC., requiring responses within thirty (30) days after service in accordance with Rule 34 of the Federal Rules of Civil Procedure, as follows:

4) Please produce and permit inspection and copying of all writings, memorandums, documents, files and other compilations of data and information, which information can be obtained and which information is in the possession, custody and control of Defendant, with the exception of any portions thereof which would disclose the mental impressions of its attorneys, their conclusions, opinions, memorandum, notes or summaries, legal research or legal theories and with the exception of any portions thereof which would disclose the mental impressions, conclusions or opinions reflecting the value or merit of a claim or defense or respective strategy or tactics of a representative of Defendant, other than attorney, which relate to the subject matter involved in this action including, but not limited to:

(a) True and correct copies of any written or oral statement, reduced to writing, provided by Mandeep Singh, in person or by telephone, following the October 5, 2001 fatality, giving rise to the within action, citing factual information he provided either to Saminder Singh, d/b/a ISD Transportation Company, Inc., his representatives or insurance carrier representatives including, but not limited to, Liberty Mutual Insurance Company, regarding the facts and circumstances surrounding the collision giving rise to the within action;

RESPONSE:

(b) True and correct copies of any memorandums and documents evidencing any contact made to Mandeep Singh for the purposes in (a), above, which indicated, either in whole or in part, that no oral or written statement was obtainable from Mandeep Singh because of his inability to speak the English language and/or because there was no interpreter available to provide interpretation of his statements;

RESPONSE:

(c) True and correct copies of 1099s and W-2s which Saminder Singh, d/b/a ISD Transportation Company, Inc., issued for the employment of Mandeep Singh in the year 2001;

RESPONSE:


(d) True and correct copies of the shipping documents provided or created as a consequence of the freight load which the tractor-trailer operated by Mandeep Singh on October 5, 2001 picked up in Buffalo, New York on October 5, 2001 and which were provided to the Pennsylvania State Police as part of their accident investigation and then thereafter returned to ISD Transportation Company, Inc. at a later date;

RESPONSE:

(e) True and correct copies of color photographs which the representatives of Saminder Singh, d/b/a ISD Transportation Company, Inc., their representatives and/or insurance company representatives including, but not limited to, Liberty Mutual, obtained of the vehicle operated by Susan Nolan and the vehicle operated by the deceased, Rajesh Padmaraju.

RESPONSE:

Respectfully submitted,  
CONNER RILEY & FRYLING

BY   
ANDREW J. CONNER, ESQUIRE  
ATTORNEY FOR PLAINTIFF  
17 West Tenth Street  
P.O. Box 860  
Erie, PA 16512-0860  
(814) 453-3343

DATED: April 26, 2005.